

Message

From: Nevshehirlian, Stepan [Nevshehirlian.Stepan@epa.gov]
Sent: 7/14/2020 11:28:36 AM
To: Taylor, Daniel [taylor.daniel@epa.gov]
Subject: RE: **Ex. 6 Personal Privacy (PP) / Ex.9 - Wells**

Yep. Good thoughts, Dan.

From: Taylor, Daniel <taylor.daniel@epa.gov>
Sent: Tuesday, July 14, 2020 7:21 AM
To: Nevshehirlian, Stepan <Nevshehirlian.Stepan@epa.gov>
Subject: RE: **Ex. 6 Personal Privacy (PP) / Ex.9 - Wells**

Agreed we wouldn't have somebody sample in substitute for us and then pay them back. I think we can bring this up on our meeting Thursday, but my initial thought with Removal sampling would be the same issue could arise if we receive certain numbers, removals hands are tied. That is unless we have already begun our sampling and have some form of decision document for how/when we provide units, removal could sample and we could act. Another option is, I have an option in the Task Order for additional round of sampling if after the initial round we realize there were people missed, or if people ask to have their wells sampled after the fact. I also have annual resampling in the Task Order, it could possibly be blended into one of those two.

From: Nevshehirlian, Stepan <Nevshehirlian.Stepan@epa.gov>
Sent: Monday, July 13, 2020 10:49 AM
To: Taylor, Daniel <taylor.daniel@epa.gov>
Subject: RE: **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

Got it. I see that too, now. I think this well could/would definitely be included in the planned sampling (along with the other wells). However, I don't believe providing compensation to another entity to conduct the sampling would be something EPA would/could do...for a lot of reasons. If timing doesn't work out with the planned RI residential well sampling. Perhaps the Removal program could perform the sampling as a "Removal Assessment".

Step

From: Taylor, Daniel <taylor.daniel@epa.gov>
Sent: Monday, July 13, 2020 10:23 AM
To: Nevshehirlian, Stepan <Nevshehirlian.Stepan@epa.gov>
Subject: FW: **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

FYI: from reading this, looks like Rick was referring to us possibly paying for the sampling.

From: Galloway, Rick (DNREC) <Rick.Galloway@delaware.gov>
Sent: Monday, July 13, 2020 9:23 AM
To: Taylor, Daniel <taylor.daniel@epa.gov>; Nevshehirlian, Stepan <Nevshehirlian.Stepan@epa.gov>
Subject: FW: **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

FYI.

Rick Galloway, P.G.
Hydrologist, Project Manager
Remediation Section

Dept. Natural Resources and Environmental Control
391 Lukens Drive
New Castle 19720-2774

Ph- 302-395-2614
Fax- 302-395-2601

From: Galloway, Rick (DNREC)
Sent: Friday, July 10, 2020 9:43 AM
To: Kasper, Joshua W. (DNREC) <Joshua.Kasper@delaware.gov>
Cc: amy bryson (Amy.Bryson@delaware.gov) <Amy.Bryson@delaware.gov>
Subject: RE: **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

Josh,

The groundwater flow direction from Procino has been relatively consistent to the south. In November 24, 2018, there was a new release of dilute Chromic Acid impacted water overflowing from a tank which leached into the groundwater from Procino. The groundwater concentrations of total chromium and hexavalent chromium down-gradient to the south have increased. There is no indication that this contamination has flowed to the southwest. I believe that I asked Procino to sample wells southwest of the release (but still on the Procino Property) for future LTS sampling but I don't have any major concerns with chromium going to the southwest at this time.

The other concern for this area is PFOA and PFOS. The most comprehensive document on the PFOA and PFOS contamination is the SI that was completed by EPA. It is a massive document. Here is a link to the Blades Groundwater files- <http://www.nav.dnrec.delaware.gov/DEN3/Detail/FacilityDetail.aspx?id=10744404>. The SI document date is 2019.06.04. The name is Final Blades Site Investigation Report. See Figure 3 and 4a for PFOA and PFOS results. In the SI report, I found three wells near the new proposed well (see attached figure). The action level for PFOA and PFAS is 70 ppt.

Number	EPA Loc ID	Address	PFOA+PFOS Result	Well Depth
2	Ex. 6 Personal Privacy (PP) / Ex. 9 - Wells		47.7 ppt	Unknown
3			298 ppt	Unknown
4			Non-Detect	Unknown

There is limited information on well depth in the area. The depth of the contamination of the PFOA/PFOS is not clear at this point. If the Site is listed, EPA will be doing a more detailed investigation. **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**
Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells from the proposed well, had levels of 298 part per trillion (ppt). Because of the proximity to the impacted groundwater, and because we are not certain of the depth of well screens or of the depths that the contamination is present, I am very concerned about the new proposed well at **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

At a minimum, I would like to see the well tested for PFOA and PFOS by method 537 Drinking water. This is an expensive test (\$400) and sampling for PFOA/PFOS is tricky because it is ubiquitous and thus is easy for cross-contamination to occur. It should be sampled by a consulting firm which will also increase the cost. EPA may consider paying for this. Let me know if you want me to ask them about paying for the sampling.

Let me know if you have any questions. Thanks.

Rick Galloway, P.G.
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From: Kasper, Joshua W. (DNREC)

Sent: Thursday, June 25, 2020 3:21 PM

To: Galloway, Rick (DNREC) <Rick.Galloway@delaware.gov>

Subject: **Ex. 6 - Personal Privacy (PP) / Ex. 9 - Wells**

Hi Rick,

We are in receipt of the attached permit application for a replacement domestic well.

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Ex. 6 Personal Privacy (PP) / Ex.9 - Wells

I reviewed some of the online site files, including a

November 2018 LTS groundwater monitoring report prepared by Ten Bears. Figure 3 of that report is a water-table contour map indicating groundwater-flow direction to be due south in the direction of Morgan Branch. This flow direction places the proposed well in somewhat of a cross-gradient position relative to Procino Plating. Is flow direction fairly consistent for this site, or is there variability in flow direction due to tidal fluctuations at the Nanticoke River? I'm also aware that there's been testing of off-site groundwater in the past, and I was wondering if you could provide a general update on any additional testing that's been done and what the major findings have been. Please let me know if you have any questions, comments, or concerns regarding the proposed well.

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Ex. 6 Personal Privacy (PP) / Ex.9 - Wells

Thanks,

Josh

Josh Kasper, P.G.

Hydrologist

DNREC-GPB

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